

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE COLGATE-PALMOLIVE CO.  
ERISA LITIGATION

Master File No. 07-cv-9515

THIS DOCUMENT RELATES TO:  
ALL ACTIONS

**PLAINTIFFS' NOTICE OF UNOPPOSED MOTION FOR FINAL APPROVAL OF  
CLASS ACTION SETTLEMENT, CLASS CERTIFICATION AND PLAN OF  
ALLOCATION, AND FOR APPROVAL OF ATTORNEYS' FEES, REIMBURSEMENT  
OF EXPENSES AND NAMED PLAINTIFFS' CASE CONTRIBUTION AWARDS**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum In Support of Plaintiffs' Unopposed Motion for Final Approval of Class Action Settlement, Class Certification and Plan of Allocation, and for Approval of Attorneys' Fees, Reimbursement of Expenses and Named Plaintiffs' Case Contribution Awards, the undersigned will move before the Honorable Lorna G. Schofield in the United States District Court for the Southern District of New York, Thurgood Marshall U.S. Courthouse, located at 40 Foley Square, Courtroom 1106, New York, NY 10007, at 10:30 a.m. on April 4, 2014, for an order in accordance with FED. R. CIV. P. 23(e), giving final approval of the parties' Settlement Agreement dated October 9, 2013 (Dkt. No. 130-1), certifying the proposed Settlement Classes, appointing Plaintiffs and Class Counsel as class representatives and counsel for the class respectively as well as approving the petition for attorneys' fees, reimbursement of expenses, and Named Plaintiffs' Case Contribution Awards.<sup>1</sup> Defendants do not oppose the relief requested in this motion.

This unopposed motion is based upon the following documents, filed herewith and incorporated fully herein:

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<sup>1</sup> All capitalized terms not otherwise defined in this Order shall have the same meaning as ascribed to them in the Settlement Agreement (Dkt. No. 130-1).

1. Plaintiffs' Memorandum in Support of Plaintiffs' Unopposed Motion for Final Approval of Class Action Settlement, Class Certification and Plan of Allocation, and for Approval of Attorneys' Fees, Reimbursement of Expenses and Named Plaintiffs' Case Contribution Awards (the "Final Approval Memorandum");
2. Declaration of Mark K. Gyandoh;
3. Declaration of Eli Gottesdiener;
4. Declaration of Douglas R. Sprong;
5. Declaration of Edgar Pauk; and
6. Declaration of Lawrence Deutsch, E.A.

As detailed in the Final Approval Memorandum, the Court should approve the proposed \$45.9 million Settlement because it was the product of arm's-length negotiations, and is fair, reasonable, and adequate as it confers a substantial benefit on the Settlement Classes. Additionally, the Court should approve the requested attorneys' fees, expenses, and Case Contribution Awards. Plaintiffs respectfully submit that the 25% requested fee award of \$11,475,000 plus the request for reimbursement of expenses in the amount of \$556,011.17 are reasonable and fair to the Settlement Classes, and justified by, among other things, the substantial time and resources committed to this action, the complexity and magnitude of the case, and the risks posed from the outset of the litigation of a possible complete non-recovery or a substantially reduced recovery for some or all of the Settlement Class members. Additionally, the requested Case Contribution Awards for the Named Plaintiffs in the amount of \$5,000 each is reasonable given the Named Plaintiffs' substantial efforts in prosecuting this matter.

WHEREFORE, for the reasons stated and such other reasons as may appear to the Court, Plaintiffs respectfully request that the Court grant the instant unopposed motion.<sup>2</sup>

Dated: March 11, 2014

Respectfully submitted,

/s/ Mark K. Gyandoh

KESSLER TOPAZ MELTZER & CHECK, LLP  
Edward W. Ciolko (admitted *pro hac vice*)  
Mark K. Gyandoh (admitted *pro hac vice*)  
280 King of Prussia Road  
Radnor, Pennsylvania 19087  
Telephone: (610) 667-7706  
Facsimile: (610) 667-7056  
Email: eciolko@ktmc.com  
mgyandoh@ktmc.com

KOREIN TILLERY LLC

Douglas R. Sprong (admitted *pro hac vice*)  
505 N. Seventh St., Suite 3600  
St. Louis, MO 63101  
Telephone: (314) 241-4844  
Facsimile: (314) 588-7036  
Email: DSprong@KoreinTillery.com

LAW OFFICE OF EDGAR PAUK

Edgar Pauk  
1066 Union Street  
Brooklyn, NY 11225  
Telephone: (718) 399-2023  
Email: lawoffice@edgarpauk.com

GOTTESDIENER LAW FIRM, PLLC

Eli Gottesdiener [EG 0111]  
498 7th Street  
Brooklyn, New York 11215  
Telephone: (718) 788-1500  
Facsimile: (718) 788-1650  
Email: eli@gottesdienerlaw.com

*Counsel for Plaintiffs and the Proposed Classes*

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<sup>2</sup> Plaintiffs will submit a proposed final order and judgment for the Court's consideration prior to or at the April 4, 2014 final fairness hearing in order to allow Plaintiffs to include proposed language in the order regarding any objections because the objection deadline does not expire until March 14, 2014.

**CERTIFICATE OF SERVICE**

I hereby certify that on the 11th day of March, 2014, I cause a true and correct copy of the foregoing document to be filed and served via the Court's Electronic Filing System.

*/s/ Mark K. Gyandoh*  
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Mark K. Gyandoh